

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

*Vs.*

Case No. 17-cr-20183  
Hon. Mark A. Goldsmith

HAROLD LASHAWN NERO (D-5),

Defendant.

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**DEFENDANT (D-5) HAROLD NERO'S NOTICE OF JOINDER  
IN CO-DEFENDANT (D-1) DARRICK DENARD BELL'S  
MOTIONS (Docs. 414-421)**

Defendant (D-5) Harold Nero, represented by attorney Mark H. Magidson, files this Notice of Joinder and moves this Honorable Court to accept his concurrence with the arguments and relief requested in each of co-defendant (D-1) Darrick Denard Bell's following motions:

- Doc. 414 - *Defendant D-1 Darrick Bell's Motion for 17c Subpoena to Request Video of Travelor's Motor Lodge;*
- Doc. 415 - *Defendant D-1 Darrick Bell's Motion for Bill of Particulars;*

- Doc. 416 - *Defendant D-1 Darrick Bell's Motion for a Written Proffer and Hearing on Admissibility of Co-Conspirator Statements under FRE 801(d)(2)(E);*
- Doc. 417 - *Defendant D-1 Darrick Bell's Motion for Pretrial Disclosure of All Evidence which the Government Intends to Offer Pursuant to Rule 404(b) of the Federal Rules of Evidence;*
- Doc. 418 - *Defendant D-1 Darrick Bell's Motion for Pretrial Release*  
**(Defendant Nero adds that his circumstances are unique, making him particularly vulnerable to the Covid-19 virus, because he suffers from a severe kidney condition that has required continued doctor's care and at least two hospitalizations while in custody pending trial.);**
- Doc. 419 - *Defendant D-1 Darrick Bell's Motion in Limine to Allow for the Cross Examination of Witness Histories of Prostitution and for the Government to Proffer FRE 412 Evidence it Seeks to Bar;*
- Doc. 420 - *Defendant D-1 Darrick Bell's Motion to Dismiss Counts 1, 3, 4, 5, 6, 7, and 8 of the Superseding Indictment;*
- Doc. 421 - *Defendant D-1 Darrick Bell's Motion to Exclude All Irrelevant and Prejudicial Evidence Contained on Videos, or in the alternative, to*

*Order the Government to Provide a Foundational Basis for Proposed Video Evidence.*

Date: March 25, 2020

Respectfully submitted,

By: /s/Mark H. Magidson  
MARK H. MAGIDSON (P25581)  
Attorney for Defendant Nero (D-5)  
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**CERTIFICATE OF SERVICE**

I certify that on March 25, 2020, I electronically filed the above *Motion in Limine* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

By: /s/Mark H. Magidson  
MARK H. MAGIDSON (P25581)  
Attorney for Defendant Nero (D-5)